



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

March 23, 2017

Thomas J. Ebbert
Manager, Remediation
PPG Industries, Inc.
440 College Park Drive
Monroeville, PA 15146

Re: Riverside Industrial Park Superfund Site, Newark, New Jersey: Administrative Settlement Agreement and Order on Consent For Remedial Investigation and Feasibility Study - CERCLA Docket No. 02-2014-2011

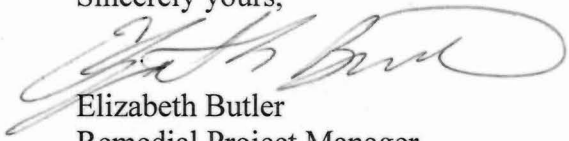
Dear Mr. Ebbert:

The U.S. Environmental Protection Agency (EPA) has reviewed PPG Industries, Inc.'s (PPG) revised submittal entitled the "Remedial Investigation and Feasibility Study Work Plan, Riverside Industrial Park Superfund Site, Newark, New Jersey, October 11, 2016" (RI/FS WP rev1). Pursuant to Paragraph 41 of the Administrative Settlement Agreement and Order on Consent for Remedial Investigation and Feasibility Study and in order to streamline the comment resolution process, EPA modified the RI/FS WP rev1 to incorporate most of the outstanding comments, which needed to be addressed prior to approval. Clean and track-changes versions are being provided electronically. Also, there are a small number of additional outstanding comments, which EPA could not incorporate; therefore, attached are EPA's additional comments on the RI/FS WP rev1. EPA expects PPG to accept the EPA modifications incorporated into the RI/FS WP rev1 (renamed to the "RI/FS WP rev2"), incorporate into the RI/FS WP rev2 the corrections called for in the comment table, and submit revision 3 of the RI/FS WP within 21 days. Modifications to the RI/FS WP rev2 should be provided in redline strikeout format electronically, until requested otherwise from EPA.

As you will see in the comment table, the detailed RI/FS schedule still needs further revisions. In accordance with Appendix A, Section III.A of the Order, "[t]he schedule shall provide for the completion of the RI/FS within twenty-four (24) months after EPA approval of the RI/FS Work Plan, or as otherwise modified by EPA." Since the RI calls for two Phases of investigation, EPA agrees with PPG that the schedule can provide for a completion date beyond the 24 months, with EPA's approval. However, rather than hold up approval of the RI/FS WP, approval of the schedule will be deferred to be worked out in a timely manner separately after mobilization of the field investigation.

We appreciate your cooperation and we look forward to continuing to work in this cooperative manner. If you have any questions, feel free to contact me at 212-637-4396.

Sincerely yours,

A handwritten signature in dark ink, appearing to read "Elizabeth Butler", with a large, stylized loop at the end.

Elizabeth Butler
Remedial Project Manager
Emergency and Remedial Response Division

Enclosures

cc: M. Sivak, EPA
W. Reilly, EPA

Compiled Comments on revision 1 of the Remedial Investigation and Feasibility Study Work Plan, Riverside Industrial Park Superfund Site, Newark, NJ Dated October 11, 2016

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Comment No.	Page and Section Reference	Comment – [Note: Previous comment #'s included in the first column as applicable. Otherwise, new comments are identified as "New" with a letter.]
1	General	The PDF documents submitted in October 2016 do not contain bookmarks. Please add bookmarks to the final document and appendices to assist in locating document sections, tables, figures, etc.
3	Figures	The cross-hatching referenced in the comment response does not appear on Figure 2-2 (which identifies both the property lot and building numbers); however, the hatching does appear on Figure 2-4 (identifies building numbers only). Please condense the information on Figures 2-2 and 2-4 into a single figure. Please also include the outlines of former buildings 4, 5, 7A, and 23 on Figure 2-2. Please include building numbers on the 'inset' figures in Section 4.2 of the Work Plan.
4/New	Table 6-1	<p>The following comments pertain to the Phase I soil boring investigation rationale presented in Table 6-1:</p> <p>a. Lot 1, Former PPG Bldg. 4 (B1 and B2): The Site Characterization Summary Report (SCSR) states on the top of page 2-5 that five 5,000 gal naphtha ASTs were located in the basement of Bldg. 4, Table 6-1 states that the ASTs had "unknown content," and page 4-2 of the RLSO Work Plan states that they were linseed oil ASTs (as shown on the historic map). Please clarify. How was the location of B1 selected within the former Bldg. 4 footprint? It seems to be somewhat on the periphery of the former building. Please move B1 westward and closer to the centerline of the former building's footprint.</p> <p>b. Lot 57, Bldg. 10: Please consider another boring (north of B10) to investigate for impacts of historical linseed oil manufacturing on the east side of Bldg. 10.</p> <p>c. Paved area between Bldgs. 2, 10, and 15: Are there underground utility corridors in this area (including portions of Lots 1, 57, and 60) that would merit soil borings to investigate for potential preferential subsurface migration of contaminants from former manufacturing and bulk storage locations?</p> <p>d. Lot 60, Bldg. 1: Please consider another boring east of B20 to further investigate the loading dock and ramp area due to the lack of prior sampling.</p> <p>e. Lot 61, Bldg. 6: Please consider adding a second boring within Bldg. 6 to further investigate former BBI solvent storage and potential PPG coal storage, incinerator, and transformer-related impacts.</p> <p>f. Lot 63, Bldg. 7: Please consider advancing borings through the basement slab to check for potential exfiltration from historical liquid waste disposal and soil impacts from PPG drum cleaning operations from former Bldg. 8. Please also consider an additional boring on the southwest corner of Lot 63, downgradient of the former naphtha ASTs. Also, for Sample B-31 – the last column starts with "no previous samples" but then lists contaminants. Should it start with "Previous samples" or is the list of contaminants incorrect?</p> <p>g. Lot 64, Former PPG Bldg. 7A: Please locate additional borings in the 'finger' of Lot 64 between Bldgs. 6 and 7 to investigate former Bldg. 7A and the eight 10,000-gallon oil ASTs shown on historical maps.</p> <p>h. Lot 65: Please consider adding a boring midway between B43 and B39 to further investigate dumping and potential historical impacts.</p> <p>i. Lot 68: Please consider adding a boring on the southeast side of the former diked AST area.</p>
17	WP Section 4.3	<p>(a) Please clarify which tenants use the sanitary sewer lines for industrial waste (refer to Section 4.3.2, 4th paragraph, first line).</p> <p>(b) Please clarify if the IWW manholes are inactive. Section 4.3.2, 4th paragraph states that IWW were only dry during a field reconnaissance in July 2016.</p>
41	Figure 6-1	Please show proposed surface soil sampling location on Figure 6-1 for Lot 66. Note that proposed composite sample has been changed to one surface soil grab sample.
42/New	Tables 6-2, 6-6, and 6-7	Per the revisions to QAPP Worksheet 20, please update the Work Plan Table 6-2 (surface soils), Table 6-6 (groundwater), and Table 6-7 (summary of samples).

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67	WP Sections 8.2 and 9.7	Please explain why Section 8.2 and Section 9.7 are identical (word-for-word). What is the intended purpose of including two duplicate text sections in the WP? Could the duplicate text in Section 9.7 be replaced with a reference to Section 8.2?
78	Figure 12-1	The presented schedule needs further revisions. In accordance with Appendix A, Section III.A of the Order, "[t]he schedule shall provide for the completion of the RI/FS within twenty-four (24) months after EPA approval of the RI/FS Work Plan, or as <u>otherwise modified by EPA</u> ." Since the RI calls for two Phases of investigation, EPA agrees with PPG that the schedule can provide for a completion date beyond the 24 months, with EPA's approval. However, rather than hold up approval of the RI/FS WP, approval of the schedule will be deferred to be worked out in a timely manner separately after mobilization of the field investigation.
88	QAPP WS 10, Section 10.5	In reference to previous comment 88, PPG responded that 2+ pages of references for data sources were added as an attachment to the QAPP. These references were not found in the revisions submitted. Therefore, please insert a cover page formatted similar to Worksheet 13 containing a bibliography of available secondary data to QAPP Appendix G.
106	QAPP WS 11 "Quality of the Data Required" (page 31) and WS 15	Every effort should be made to choose laboratory quantitation limits (i.e., lowest calibration point) that will meet the Project Action Limits (PALs). A number of the proposed detection limits will not meet the PALs, and they may not meet the ARARs either. Pending the results, this issue may result in a need to re-sample.
116	QAPP WS 16 (page 106)	Once the schedule is approved, the initiation, completion and deliverable due dates should be included here.
139	SOP S-16 "Sampling Equipment Procedure" (page 2)	Please revise the section on decontamination of sampling equipment to be consistent with the NJDEP Field Sampling Procedures Manual's recommendations – please see revisions made to QAPP WS21
141	SOP S-20	Please include field forms currently listed in Appendix B "Examples of Field Forms and Log Sheets" in the new SOP for field documentation.
New A	Table of Contents	Since a number of changes have been made to the document, please review the Table of Contents to ensure the page numbering and headings are still accurate.
New B	General	Are all the CEAs in the RIP currently monitored? Please provide all recent and future CEA reports to EPA.
New C	WP Section 2.3.1.6 (page 2-4), Para. 1, Line 2	Please be more specific as to what "various sources" are (i.e., historical maps and photographs of PPG operations, and/or EPA/DEP documentation, correspondence, etc.) or add a cross-reference to the appropriate section(s) of the SCSR.
New D	WP Section 2.3.1.6 (page 2-4), Para. 2, Line 2	The Work Plan states that "[w]astes were reused in production or disposed of off property". (This statement is not in accord with the information that USEPA has with regard to wastes that PPG left on Site and/or found in the buildings, surrounding soil, and subsurface soil.). Rephrase with language similar to that used in SCSR Section 2.5.1.
New E	WP Section 2.3.2 (page 2-5), Para. 1, Line 1	Please be more specific as to what the source(s) for the "currently available information" are (i.e. historical maps and photographs of PPG operations, and/or EPA/DEP documentation, correspondence etc.) or add a cross-reference to the appropriate section(s) of the SCSR.
New F	WP Section 4.3.3 (page 4-25), Para. 6, Line 1	The Work Plan states that "Woodard & Curran considered PPG blueprints, constructions specifications and other historical records...". Please be more specific as to where/what these "records" are or add a cross-reference to the appropriate section(s) of the SCSR.

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New G	Table 6-5	<ol style="list-style-type: none"> Lot 68 has a CEA for a plume that appears to extend onto Lot 67 and maybe Lots 65 and 66. Additional monitoring wells and sampling are required. An attached map shows well locations. Results of the direct push sampling program could also indicate locations for other permanent wells. The blue circles are suggested monitoring well locations. The green circle is a proposed location if groundwater screening shows contaminants are present at this location. An extensive area of soil contamination exists on Lot 70 near proposed boring B-67. Additional monitoring wells and sampling are required.
New H	New Figures	<p>New figure comments:</p> <ol style="list-style-type: none"> Add Building Numbers to Figure 2-3. Add a text box to Figures 4-1 through 4-5 noting that the green dots represent sampling locations and the white text boxes represent the corresponding samples associated with the location. Please expand the white text boxes to list the sampling depth for each sample ID listed in Figures 4-1 through 4-5. Please add an inset map to Figures 4-1 through 4-5 (except Figure 4-3) showing the sediment sampling locations relative to the Study Area. Please add Building Numbers to Figures 6-1 and 6-2.
New I	QAPP WS15 (Please see EXCEL Spreadsheet)	<ol style="list-style-type: none"> In the revised QAPP file, the original Worksheet 15 (in its entirety) was removed. When the QAPP is finalized, please insert a new Worksheet 15 using the Excel Spreadsheet that has been prepared. No columns should be deleted when the file is pasted into the final QAPP; however, the lab MDL can be added, if needed. Applicable notes for Worksheet 15 have been provided and should be inserted into the Final QAPP. There is no change to Worksheet 15 for the Waste Characterization; however, it is recommended that the information be reviewed with the disposal facility to verify 40CFR Part 261 values because it was observed during review of the October 10, 2016 QAPP that several regulatory values were off by a factor of 10. This error may have carried over to the Waste Characterization WS 15. For Soil, Groundwater, and Sewer Water, the EPA CLP SOW offers several method variations (such as "Trace VOC" versus "Low VOC"). For completeness, a column has been added to WS 15 to indicate the corresponding method with selected CLP CRQL. When the EPA CLP CRQL could not achieve the PAL, then EPA CLP SOW Modifications and Chemtech Achievable QLs for SW-846 Methods were reviewed. If these methods provided a lower QL that satisfied the PAL, then the alternative method is listed in WS 15 in red font. For the Vapor PAL, the WS 15 provided in the original QAPP (dated October 10, 2016) included a list of target analytes. When this list was compared to Method TO-15 CLP SOW targets and NJDEP VISL tables (March 2013), eleven targets were missing. These 11 targets have been added to the revised WS 15 spreadsheet. Please contact ChemTech to obtain the respective QLs for these 11 targets.
New J	QAPP WS20	Once additional borings and/or monitoring wells are included in the program, then the "count" in QAPP WS 20 needs to be updated.
New K	QAPP	Given all of the modifications to the QAPP, please do a QA check, especially to ensure that WS28 is consistent with WS12